

**Exhibit 13**  
**(Unsealed)**  
**(Previously Filed Under Seal as Dkt. 412)**

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,  
an Indiana corporation, and ACE  
AMERICAN INSURANCE COMPANY, a  
Pennsylvania corporation,

**FEDERAL INSURANCE COMPANY'S  
FIFTH SUPPLEMENTAL ANSWER  
TO PLAINTIFF'S INTERROGATORY  
NO. 16 AND SIXTH SUPPLEMENTAL  
ANSWER TO PLAINTIFF'S  
INTERROGATORY NO. 17**

Defendants.

To: Plaintiff and its attorneys, Allen Hinderaker, Heather Kliebenstein and Michael A. Erbele, Merchant & Gould P.C., 3200 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402.

Defendant Federal Insurance Company ("Federal"), for its Fifth Supplemental Answer to Plaintiff's Interrogatory No. 16 and Sixth Supplemental Answer to Plaintiff's Interrogatory No. 17, states and alleges as follows:

**GENERAL RESPONSES**

1. Federal objects to the Definitions and Instructions to the extent that they seek to impose obligations on Federal that either exceed, or are different from, what is required under the Federal Rules of Civil Procedure, District of Minnesota Local Rules, and the Stipulated E-Discovery Order.

2. Federal objects to the requests to the extent that they seek information protected from discovery under the attorney-client privilege or work product doctrine.

**EXHIBIT**

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3. Federal's responses and objections are made to the best of Federal's present knowledge, information, and belief. Federal's responses and objections are limited to information within its possession, custody, or control. Federal reserves the right to amend, supplement, or change any responses and objections if and when additional, different, or more accurate information becomes available and/or facts are developed.

4. Federal gives these Responses subject to all objections to admissibility that may be interposed in this proceeding.

**FIFTH SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 16**

**INTERROGATORY NO. 16:** For all insurance policies in connection with which the Blaze Advisor® software was used, the gross written premium of Defendants 1 and the gross written premium of each related company, including the specific identification of each related company, for each year from 2007-2012. For clarity, this Interrogatory is not seeking investment income, other income, or capital and surplus accounts.

**SUPPLEMENTAL ANSWER:** Defendants object to the request for "all" insurance policies and the request for information more than 10 years old as overbroad, unduly burdensome, and not proportional to the needs of this case. Defendants also object to this Interrogatory as compound and impermissibly constituting multiple interrogatories, which are limited in number under the Federal Rules. Defendants also object to this Interrogatory as vague and ambiguous in failing to identify the relevant "use" and calling for insurance policies "in connection with." Defendants further object to this Interrogatory because "the gross written premium" of Defendants and the "gross written premium of each related company" are not relevant to any claim or defense in this action, including because Defendants' profits are not reasonably related to the alleged

infringement, as is necessary for FICO to obtain an award of the defendant's profits. *See, e.g., Francois v. Ruch*, 2006 WL 3735950, at \*3 (C.D. Ill. Dec. 15, 2006). Defendants further object to the extent the Interrogatory seeks information not in the possession, custody, or control of Defendants, and thus exceed the scope of discovery under Federal Rule 26(b)(1).

Subject to, and without waiving these objections, Defendants state the following:

- For Chubb Specialty Insurance (CSI) business unit for the years identified below (pre-merger), the following applications used Blaze Advisor® software: CSI Express, Decision Point, Automated Renewal Process, and Profitability Indicator. The approximate gross written premiums, policy counts, and identification of the insurance writing companies that issued insurance policies that used these applications, in connection with which the Blaze Advisor® software was used, is provided in the charts below for the years requested. Discovery is continuing.
- For Decision Point (DP):**

Year / Writing Company	Gross Written Premium	Policy Count
<b>2012</b>	<b>\$ 841,138.45</b>	<b>315</b>
CICNJ	\$ 43,874	11
FIC-D	\$797,264.45	304
<b>2011</b>	<b>\$21,515.00</b>	<b>25</b>
FIC-D	\$21,515.00	25

- For CSI eXPRESS (CSIX), Automated Renewal Process (ARP), and Profitability Indicator(PI):**

Year / Writing Company	Gross Written Premium	Policy Count
<b>2007</b>	<b>\$535,562,441.59</b>	<b>26480</b>
<b>CSIX/ARP/PI</b>	<b>\$411,831,105.63</b>	<b>16736</b>
ERII	\$58,277,903.30	3254
ERSIC	\$9,371,205.00	368
FIC-D	\$297,654,366.14	12008
VIG-D	\$14,162,587.69	386
CICC-CN	\$32,365,043.50	720
<b>New Business PI excluding DP</b>	<b>\$123,731,335.96</b>	<b>9744</b>
ERII	\$9,953,075.00	724
ERSIC	\$721,368.00	75

FIC-D	\$111,978,546.96	8873
VIG-D	\$1,078,346.00	72
<b>2008</b>	<b>\$1,647,709,716.96</b>	<b>81305</b>
<b>CSIX/ARP/PI</b>	<b>\$1,537,325,711.23</b>	<b>71254</b>
ERII	\$215,268,902.92	13218
ERSIC	\$34,309,203.02	1557
FIC-D	\$1,147,027,596.80	51879
VIG-D	\$35,052,497.18	1729
CICC-CN	\$105,667,511.31	2871
<b>New Business PI excluding DP</b>	<b>\$110,384,005.73</b>	<b>10051</b>
ERII	\$9,021,079.53	697
ERSIC	\$597,548.00	50
FIC-D	\$98,576,897.65	9217
VIG-D	\$2,188,480.55	87
<b>2009</b>	<b>\$1,600,826,011.19</b>	<b>81508</b>
<b>CSIX/ARP/PI</b>	<b>\$1,506,514,316.52</b>	<b>73363</b>
ERII	\$194,276,702.47	12207
ERSIC	\$31,409,594.04	1573
FIC-D	\$1,140,513,335.09	54821
VIG-D	\$35,693,057.72	1755
CICC-CN	\$104,621,627.20	3007
<b>New Business PI excluding DP</b>	<b>\$94,311,694.67</b>	<b>8145</b>
ERII	\$6,680,477.08	584
ERSIC	\$464,553.00	41
FIC-D	\$83,789,151.59	7432
VIG-D	\$3,377,513.00	88
<b>2010</b>	<b>\$1,568,376,724.75</b>	<b>83750</b>
<b>CSIX/ARP/PI</b>	<b>\$1,481,374,670.62</b>	<b>74633</b>
ERII	\$159,069,222.21	10854
ERSIC	\$29,839,730.67	1500
FIC-D	\$1,160,731,158.10	57666
VIG-D	\$27,464,481.03	1397
CICC-CN	\$104,270,078.61	3216
<b>New Business PI excluding DP</b>	<b>\$87,002,054.13</b>	<b>9117</b>
ERII	\$8,576,242.68	672
ERSIC	\$1,200,424.00	101
FIC-D	\$76,751,867.45	8323
VIG-D	\$473,520.00	21
<b>2011</b>	<b>\$1,580,943,278.49</b>	<b>85628</b>
<b>CSIX/ARP/PI</b>	<b>\$1,485,590,454.28</b>	<b>76039</b>

CICNJ	\$112,740.00	11
ERII	\$151,037,252.06	10516
ERSIC	\$34,021,861.87	1593
FIC-D	\$1,181,357,358.75	60023
VIG-D	\$17,418,127.00	522
CICC-CN	\$101,643,114.60	3374
<b>New Business PI excluding DP</b>	<b>\$95,352,824.21</b>	<b>9589</b>
CICNJ	\$303,777.00	40
ERII	\$8,454,998.04	663
ERSIC	\$1,221,594.00	88
FIC-D	\$85,355,418.17	8795
VIG-D	\$17,037.00	3
<b>2012</b>	<b>\$ 1,508,121,584.43</b>	<b>84933</b>
<b>CSIX/ARP/PI</b>	<b>\$1,435,649,008.31</b>	<b>76787</b>
CICNJ	\$7,827,401.52	669
ERII	\$123,450,577.97	8964
ERSIC	\$38,050,155.78	1626
FIC-D	\$1,153,902,459.39	61539
VIG-D	\$12,781,568.00	375
CICC-CN	\$99,636,845.65	3614
<b>New Business PI excluding DP</b>	<b>\$72,472,576.12</b>	<b>8146</b>
CICNJ	\$1,142,317.00	112
ERII	\$2,580,177.00	247
ERSIC	\$594,746.00	33
FIC-D	\$68,064,968.12	7735
PACIFICPI	\$54,692.00	15
VIG-D	\$35,676.00	4

- CSI eXPRESS, Automated Renewal Process, and Profitability Indicator are combined all together in one chart because creating a separate chart for each application would result in triple-counting of the policy counts and gross written premiums. In other words, policies and premiums that go through one of these applications goes through the other two applications as well.
- For Corporate Business Systems (CBS), which is not a strategic business unit (SBU), the following application uses Blaze Advisor® software: Premium Booking. The approximate gross written premiums and policy counts that used these applications, in connection with which the Blaze Advisor® software was used, is provided in the charts below for the years requested. Discovery is continuing.



Year	Gross Written Premium	Policy Count
2012	\$29,745,346.00	2,945

- Premium Booking did not start using Blaze Advisor® until 2012, and therefore, there is no information to produce for years 2007-2011.
- The data for Premium Booking is extracted from a mainframe DB2 table that is specifically tracking the policies that passed through the Premium Booking “rules” as constructed in/using the Blaze Advisor® tool. Unfortunately, this table does not include writing company and that information could not be correlated to the policy count/gross written premium values being provided.
- For the Chubb Commercial Insurance (CCI) business unit for the years identified below (pre-merger), the following applications use Blaze Advisor® software: CUW-IM, TAPS, and IRMA. The approximate gross written premiums, policy counts, and identification of the insurance writing companies that issued insurance policies that used these applications, in connection with which the Blaze Advisor® software was used, is provided in the charts below for the years requested. Discovery is continuing.
- **For CUW-IM:**

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
2008	CHUBB CUSTOM INSURANCE COMPANY	3	\$129,335.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	4	\$39,920.00
	CHUBB EUROPEAN GROUP SE	16	\$183,784.00
	CHUBB INDEMNITY INSURANCE COMPANY	1,852	\$103,322,677.00
	CHUBB INSURANCE COMPANY OF CANADA	8	\$222,472.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	1,303	\$24,462,200.00
	FEDERAL INSURANCE COMPANY	151,876	\$4,201,082,024.00
	GREAT NORTHERN INSURANCE COMPANY	25,331	\$747,513,504.00
	NORTHWESTERN PACIFIC INDEMNITY COMPANY	358	\$6,320,003.00
	PACIFIC INDEMNITY COMPANY	5,505	\$286,408,076.00
	SAMSUNG FIRE & MARINE INSURANCE CO., LTD	30	\$26,593,838.00
	SUN INSURANCE OFFICE OF AMERICA INC.	1	\$89,907.00
	TEXAS PACIFIC INDEMNITY COMPANY	200	\$1,205,973.00
	VIGILANT INSURANCE COMPANY	8,366	\$420,273,080.00
2009	CHUBB CUSTOM INSURANCE COMPANY	4	\$76,310.00
	CHUBB DE MEXICO	1	\$2,580.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	9	\$97,884.00

	CHUBB EUROPEAN GROUP SE	26	\$208,523.00
	CHUBB INDEMNITY INSURANCE COMPANY	2,353	\$136,955,926.00
	CHUBB INSURANCE COMPANY OF CANADA	2	\$17,222.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	1,082	\$20,203,550.00
	FEDERAL INSURANCE COMPANY	141,455	\$3,889,510,342.00
	GREAT NORTHERN INSURANCE COMPANY	25,696	\$743,274,793.00
	NORTHWESTERN PACIFIC INDEMNITY COMPANY	285	\$5,138,825.00
	PACIFIC INDEMNITY COMPANY	5,095	\$316,683,766.00
	SAMSUNG FIRE & MARINE INSURANCE CO., LTD	11	\$6,429,996.00
	TEXAS PACIFIC INDEMNITY COMPANY	153	\$1,172,010.00
	VIGILANT INSURANCE COMPANY	8,057	\$374,920,202.00
2010	CHUBB CUSTOM INSURANCE COMPANY	1,040	\$122,103,178.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	5	\$20,482.00
	CHUBB EUROPEAN GROUP SE	15	\$105,501.00
	CHUBB INDEMNITY INSURANCE COMPANY	3,101	\$177,055,083.00
	CHUBB INSURANCE COMPANY OF CANADA	1	\$88,658.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	2,210	\$42,920,170.00
	CHUBB NATIONAL INSURANCE COMPANY	92	\$3,123,826.00
	CHUBB SEGUROS CHILE S.A.	1	\$2,500.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	52	\$8,697,695.00
	FEDERAL INSURANCE COMPANY	137,371	\$3,698,684,632.00
	GREAT NORTHERN INSURANCE COMPANY	27,458	\$780,112,475.00
	NORTHWESTERN PACIFIC INDEMNITY COMPANY	133	\$1,914,352.00
	PACIFIC INDEMNITY COMPANY	4,922	\$321,119,086.00
	SAMSUNG FIRE & MARINE INSURANCE CO., LTD	21	\$11,122,629.00
	TEXAS PACIFIC INDEMNITY COMPANY	48	\$561,491.00
	VIGILANT INSURANCE COMPANY	7,116	\$337,428,287.00
2011	CHUBB ARGENTINA DE SEGUROS, S.A.	1	\$5,000.00
	CHUBB CUSTOM INSURANCE COMPANY	3,491	\$385,518,178.00
	CHUBB DE MEXICO	1	\$989.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	1	\$2,580.00
	CHUBB EUROPEAN GROUP SE	17	\$146,591.00
	CHUBB INDEMNITY INSURANCE COMPANY	3,716	\$226,657,032.00
	CHUBB INSURANCE COMPANY OF CANADA	4	\$21,549.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	3,136	\$70,496,940.00
	CHUBB NATIONAL INSURANCE COMPANY	441	\$15,385,996.00
	EXECUTIVE RISK INDEMNITY INC.	2	\$280,287.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	198	\$19,035,150.00
	FEDERAL INSURANCE COMPANY	138,433	\$3,880,746,649.00
	GREAT NORTHERN INSURANCE COMPANY	28,099	\$788,375,650.00
	NORTHWESTERN PACIFIC INDEMNITY COMPANY	46	\$433,898.00



	PACIFIC INDEMNITY COMPANY	4,960	\$377,203,972.00
	SAMSUNG FIRE & MARINE INSURANCE CO., LTD	18	\$10,144,642.00
	TEXAS PACIFIC INDEMNITY COMPANY	5	\$25,153.00
	VIGILANT INSURANCE COMPANY	7,905	\$326,713,561.00
2012	CHUBB ARGENTINA DE SEGUROS, S.A.	1	\$2,171.00
	CHUBB CUSTOM INSURANCE COMPANY	3,149	\$362,776,790.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	4	\$11,268.00
	CHUBB EUROPEAN GROUP SE	23	\$130,168.00
	CHUBB INDEMNITY INSURANCE COMPANY	3,908	\$286,930,612.00
	CHUBB INSURANCE COMPANY OF CANADA	1	\$2,487.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	3,651	\$81,243,737.00
	CHUBB NATIONAL INSURANCE COMPANY	406	\$16,658,095.00
	EXECUTIVE RISK INDEMNITY INC.	2	\$292,610.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	182	\$17,683,967.00
	FEDERAL INSURANCE COMPANY	137,255	\$4,079,734,667.00
	GREAT NORTHERN INSURANCE COMPANY	28,105	\$810,808,702.00
	NORTHWESTERN PACIFIC INDEMNITY COMPANY	1	\$595.00
	PACIFIC INDEMNITY COMPANY	4,777	\$400,541,236.00
	SAMSUNG FIRE & MARINE INSURANCE CO., LTD	2	\$630,548.00
	VIGILANT INSURANCE COMPANY	7,082	\$318,640,317.00

- CUW-IM did not start using Blaze Advisor® until 2008, and therefore, there is no information to produce for 2007.

- **For IRMA:**

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
2012	CHUBB CUSTOM INSURANCE COMPANY	124	\$595,754.00
	CHUBB DE MEXICO	1	\$2,360.99
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	12	\$8,124.14
	CHUBB EUROPEAN GROUP SE	4	\$51,563.72
	CHUBB INDEMNITY INSURANCE COMPANY	1	\$2,199.00
	CHUBB INSURANCE COMPANY OF CANADA	1365	\$5,547,323.51
	CHUBB INSURANCE COMPANY OF NEW JERSEY	229	\$951,268.54
	CHUBB SEGUROS COLOMBIA S.A.	1	\$24,878.52
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	4	\$3,735.00
	FEDERAL INSURANCE COMPANY	9426	\$58,631,246.19
	GREAT NORTHERN INSURANCE COMPANY	3184	\$15,000,997.57
	PACIFIC INDEMNITY COMPANY	455	\$5,097,902.73
	VIGILANT INSURANCE COMPANY	782	\$4,226,667.39

- IRMA did not start using Blaze Advisor® until 2012, and therefore, there is no information to produce for 2007-2011.
- TAPS did not start using Blaze Advisor® until 2013, and therefore, there is no information to produce for 2007-2012.
- ERCIS Claims is a claims system (not a policy system), and therefore, there is no gross written premium or policy count associated with the application.
- For the Surety business unit for the years identified below (pre-merger), the following application does not use Blaze Advisor® software: Cornerstone. However, as ordered by the Court, below are the approximate gross written premiums, policy counts, and identification of the insurance writing company that issued insurance policies that used Cornerstone:

Year/Writing Company	Policy Count	Gross Written Premium
<b>2008</b>	<b>481,556</b>	<b>\$307,351,621</b>
Chubb Ins Co of Canada	13,729	\$8,420,284
Federal Ins Co - Canada	43	\$40,945
Federal Insurance Co	430,775	\$276,055,563
Pacific Indemnity Co	3,234	\$11,008,167
Vigilant Insurance Co	33,775	\$11,826,663
<b>2009</b>	<b>430,447</b>	<b>\$282,380,066</b>
Chubb Ins Co of Canada	12,762	\$8,505,028
Federal Ins Co - Canada	20	\$2,500
Federal Insurance Co	384,536	\$261,813,664
Pacific Indemnity Co	3,344	\$1,569,949
Vigilant Insurance Co	29,785	\$10,488,925
<b>2010</b>	<b>408,113</b>	<b>\$271,330,135</b>
Chubb Ins Co of Canada	12,839	\$15,155,558
Federal Ins Co - Canada	19	\$0
Federal Insurance Co	363,973	\$245,493,837
Pacific Indemnity Co	3,315	\$4,715,975
Vigilant Insurance Co	27,967	\$5,964,764
<b>2011</b>	<b>379,051</b>	<b>\$262,102,758</b>
Chubb Ins Co of Canada	12,408	\$17,742,302
Federal Ins Co - Canada	2	\$0
Federal Insurance Co	336,742	\$232,835,157
Pacific Indemnity Co	2,989	\$5,741,267
Vigilant Insurance Co	26,910	\$5,784,032
<b>2012</b>	<b>355,938</b>	<b>\$211,057,807</b>

Chubb Ins Co of Canada	12350	\$9,914,474
Federal Ins Co - Canada	12	\$4,223
Federal Insurance Co	315037	\$190,176,397
Pacific Indemnity Co	3333	\$5,447,405
Vigilant Insurance Co	25206	\$5,515,309

### **SIXTH SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 17**

**INTERROGATORY NO. 17:** For all insurance policies in connection with which the Blaze Advisor® software was used, the gross written premium of Defendants and the gross written premium of each related company, including the specific identification of each related company, for each quarter from March 30, 2016 to date. For clarity, this Interrogatory is not seeking investment income, other income, or capital and surplus accounts.

**ANSWER:** Defendants object to the request for “all” insurance policies as overbroad, unduly burdensome, and not proportional to the needs of this case. Defendants also object to this Interrogatory as compound and impermissibly constituting multiple interrogatories, which are limited in number under the Federal Rules. Defendants also object to this Interrogatory as vague and ambiguous in failing to identify the relevant “use” and calling for insurance policies “in connection with.” Defendants further object to this Interrogatory because “the gross written premium” of Defendants and the “gross written premium of each related company” are not relevant to any claim or defense in this action, including because Defendants’ profits are not reasonably related to the alleged infringement, as is necessary for FICO to obtain an award of the defendants’ profits. *See, e.g., Francois v. Ruch*, 2006 WL 3735950, at \*3 (C.D. Ill. Dec. 15, 2006). Defendants further object to the extent the Interrogatory seeks information not in the possession, custody, or control of Defendants, and thus exceeds the scope of discovery under Federal Rule 26(b)(1).

Subject to, and without waiving these objections, Federal states the following:

- For the Financial Lines Unit (post-merger) for the years identified below, the following applications use Blaze Advisor® software: CSI Express, Decision Point, Automated Renewal Process, and Profitability Indicator. The approximate gross written premiums, policy counts, and identification of the insurance writing companies that issued insurance policies that used these applications, in connection with which the Blaze Advisor® software was used, is provided in the charts below for the years requested. Discovery is continuing.

- For Decision Point (DP):**

Year / Writing Company	Gross Written Premium	Policy Count
<b>2019</b>	<b>\$1,347,731.00</b>	<b>466.00</b>
CICNJ	\$80,257.00	19.00
ERII	\$14,133.00	1.00
FIC-D	\$1,253,341.00	446.00
<b>2018</b>	<b>\$4,814,337.77</b>	<b>1697.00</b>
CICNJ	\$236,749.00	71.00
ERII	\$34,899.00	5.00
FIC-D	\$4,542,689.77	1621.00
<b>2017</b>	<b>\$4,319,855.92</b>	<b>1447.00</b>
CICNJ	\$319,436.68	82.00
ERII	\$34,636.00	3.00
FIC-D	\$3,965,783.24	1362.00
<b>2016</b>	<b>\$3,547,608.80</b>	<b>1162.00</b>
CICNJ	\$182,249.80	43.00
ERII	\$5,465.00	1.00
FIC-D	\$3,359,894.00	1118.00

- For CSI eXPRESS (CSIX), Automated Renewal Process (ARP), and Profitability Indicator (PI):**

Year / Writing Company	Gross Written Premium	Policy Count
<b>2016</b>	<b>\$ 1,526,511,534.36</b>	<b>90555</b>
<b>CSIX/ARP/PI</b>	<b>\$ 1,444,514,455.23</b>	<b>82191</b>
CICNJ	\$ 21,543,942.90	1893
ERII	\$ 74,655,072.17	5326
ERSIC	\$ 31,403,417.00	1466
FIC-D	\$ 1,210,424,578.61	68552
PACIFICPI	\$ 150,747.00	64
VIG-D	\$ 7,425,581.00	98



CICC-CN	\$	98,911,116.55	4792
<b>New Business PI excluding DP</b>	<b>\$</b>	<b>81,997,079.13</b>	<b>8364</b>
CICNJ	\$	2,212,095.00	268
ERII	\$	492,570.48	52
ERSIC	\$	1,026,440.46	72
FIC-D	\$	75,579,124.19	7694
PACIFICPI	\$	206,637.00	34
CICC-CN	\$	2,480,212.00	244
<b>2017</b>	<b>\$</b>	<b>1,462,910,856.49</b>	<b>91631</b>
<b>CSIX/ARP/PI</b>	<b>\$</b>	<b>1,351,871,992.43</b>	<b>82188</b>
CICNJ	\$	20,940,256.13	1999
ERII	\$	62,459,326.84	4808
ERSIC	\$	28,856,329.46	1389
FIC-D	\$	1,132,709,567.53	69042
PACIFICPI	\$	331,853.03	86
VIG-D	\$	6,697,327.00	71
CICC-CN	\$	99,877,332.44	4793
<b>New Business PI excluding DP</b>	<b>\$</b>	<b>111,038,864.06</b>	<b>9443</b>
CICNJ	\$	2,916,920.00	250
ERII	\$	441,480.80	23
ERSIC	\$	1,256,712.58	93
FIC-D	\$	101,305,050.77	8483
PACIFICPI	\$	262,033.00	44
VIG-D	\$	3,346.00	1
CICC-CN	\$	4,853,320.91	549
<b>2018</b>	<b>\$</b>	<b>1,406,041,567.67</b>	<b>93653</b>
<b>CSIX/ARP/PI</b>	<b>\$</b>	<b>1,268,911,770.98</b>	<b>82523</b>
CCIC	\$	3,309,818.00	195
CICNJ	\$	22,833,376.00	2098
ERII	\$	49,158,127.00	4254
ERSIC	\$	11,370,649.00	797
FIC-D	\$	1,084,053,466.78	70090
PACIFICPI	\$	384,509.00	55
VIG-D	\$	5,071,070.00	53
CICC-CN	\$	92,730,755.20	4981
<b>New Business PI excluding DP</b>	<b>\$</b>	<b>137,129,796.69</b>	<b>11130</b>
CCIC	\$	1,210,985.00	46
CICNJ	\$	3,180,349.00	376
ERII	\$	10,429.00	4
ERSIC	\$	1,377,654.00	100



FIC-D	\$ 126,368,941.69	10050
PACIFICPI	\$ 101,678.00	21
CICC-CN	\$ 4,879,760.00	533
<b>2019</b>	<b>\$ 302,773,970.00</b>	<b>30021</b>
<b>CSIX/ARP/PI</b>	<b>\$ 275,066,375.00</b>	<b>27267</b>
CCIC	\$ 2,618,203.00	184
CICNJ	\$ 6,335,054.00	702
ERII	\$ 11,593,477.00	1323
FIC-D	\$ 241,187,027.00	23734
PACIFICPI	\$ 105,626.00	22
VIG-D	\$ 220,288.00	11
CICC-CN	\$ 13,006,700.00	1291
<b>New Business PI excluding DP</b>	<b>\$ 27,707,595.00</b>	<b>2754</b>
CCIC	\$ 209,354.00	17
CICNJ	\$ 588,605.00	77
FIC-D	\$ 26,215,624.00	2562
PACIFICPI	\$ 5,075.00	2
VIG-D	\$ 2,296.00	1
CICC-CN	\$ 686,641.00	95

- CSI eXPRESS, Automated Renewal Process, and Profitability Indicator are combined all together in one chart because creating a separate chart for each application would result in triple-counting of the policy counts and gross written premiums. In other words, policies and premiums that go through one of these applications goes through the other two applications as well.
- For Corporate Business Systems (CBS), which is not a strategic business unit (SBU), the following application uses Blaze Advisor® software: Premium Booking. The approximate gross written premiums and policy counts that used these applications, in connection with which the Blaze Advisor® software was used, is provided in the charts below for the years requested. Discovery is continuing.

Year	Gross Written Premium	Policy Count
2018	\$500,850,828.90	57,023
2017	\$442,839,931.87	60,142
2016	\$503,432,073.43	57,219

- The data for Premium Booking is extracted from a mainframe DB2 table that is specifically tracking the policies that passed through the Premium Booking “rules” as constructed in/using the Blaze Advisor® tool. Unfortunately, this table does not include writing company and that information could not be correlated to the policy count/gross written premium values being provided.
- For the Chubb Commercial Insurance (CCI) business unit for the years identified below (post-merger), the following applications use Blaze Advisor® software: CUW-IM, TAPS, and IRMA. The approximate gross written premiums, policy counts, and identification of the insurance writing companies that issued insurance policies that used these applications, in connection with which the Blaze Advisor® software was used, is provided in the charts below for the years requested. Discovery is continuing.
- **For CUW-IM:<sup>1</sup>**

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
2016	CHUBB CUSTOM INSURANCE COMPANY	2,127	\$217,444,131.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	8	\$41,810.00
	CHUBB EUROPEAN GROUP SE	44	\$260,360.00
	CHUBB INDEMNITY INSURANCE COMPANY	4,475	\$515,778,122.00
	CHUBB INSURANCE AUSTRALIA LIMITED	6	\$223,981.00
	CHUBB INSURANCE COMPANY LIMITED	4	\$10,686.00
	CHUBB INSURANCE COMPANY OF CANADA	7	\$173,352.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	3,635	\$69,278,561.00
	CHUBB NATIONAL INSURANCE COMPANY	1,223	\$50,975,438.00
	CHUBB SEGUROS BRASIL, S.A.	2	\$4,281.00
	EXECUTIVE RISK INDEMNITY INC.	13	\$2,167,006.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	28	\$4,528,627.00
	FEDERAL INSURANCE COMPANY	141,235	\$4,800,540,559.00
	GREAT NORTHERN INSURANCE COMPANY	30,523	\$868,809,231.00
	PACIFIC INDEMNITY COMPANY	4,568	\$426,214,814.00
	VIGILANT INSURANCE COMPANY	6,478	\$307,080,046.00
	ACE American Insurance Co	2,890	\$108,983,073.98
	ACE Fire Underwriters Ins	38	\$1,092,991.43
	ACE Property and Casualty	768	\$106,304,729.88

<sup>1</sup> We understand that this financial information includes policies that were brought in under a system that includes policies that are renewed using Blaze, but automatically at the same time includes the prior transaction involving the same policy regardless whether it uses Blaze. We are seeking a way to not include the prior policy since it results in the financial information having inflated numbers.

	Illinois Union Insurance	1,183	\$81,709,115.00
	Indemnity Insurance Co of	97	\$17,014,247.06
	Pacific Employers Insurance	6	\$469,700.00
	Westchester Surplus Lines	132	\$12,587,416.00
	WFIC for Bus.Eff.1/1/11	1,010	\$31,266,954.00
2017	CHUBB CUSTOM INSURANCE COMPANY	1,119	\$125,046,576.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	2	\$12,403.00
	CHUBB EUROPEAN GROUP SE	40	\$368,955.00
	CHUBB INDEMNITY INSURANCE COMPANY	5,986	\$581,425,852.00
	CHUBB INSURANCE AUSTRALIA LIMITED	2	\$5,554.00
	CHUBB INSURANCE COMPANY LIMITED	3	\$7,913.00
	CHUBB INSURANCE COMPANY OF CANADA	2	\$14,184.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	3,432	\$65,809,698.00
	CHUBB NATIONAL INSURANCE COMPANY	1,906	\$68,554,767.00
	CHUBB SEGUROS BRASIL, S.A.	2	\$16,297.00
	EXECUTIVE RISK INDEMNITY INC.	11	\$2,732,882.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	11	\$1,102,030.00
	FEDERAL INSURANCE COMPANY	147,481	\$5,098,798,285.00
	GREAT NORTHERN INSURANCE COMPANY	31,605	\$912,720,319.00
	PACIFIC INDEMNITY COMPANY	4,825	\$468,474,693.00
	VIGILANT INSURANCE COMPANY	6,461	\$324,338,205.00
	ACE American Insurance Co	8,243	\$354,885,926.81
	ACE Fire Underwriters Ins	53	\$1,722,590.00
	ACE Property and Casualty	2,413	\$248,919,844.00
	Illinois Union Insurance	3,444	\$255,341,641.00
	Indemnity Insurance Co of	281	\$21,351,439.00
	Pacific Employers Insurance	21	\$869,381.00
	Westchester Surplus Lines	476	\$45,285,709.00
	WFIC for Bus.Eff.1/1/11	2,246	\$67,191,783.00
2018	CHUBB CUSTOM INSURANCE COMPANY	610	\$68,563,377.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	1	\$16,435.00
	CHUBB EUROPEAN GROUP SE	16	\$85,623.00
	CHUBB INDEMNITY INSURANCE COMPANY	4,962	\$443,033,892.00
	CHUBB INSURANCE AUSTRALIA LIMITED	1	\$25,208.00
	CHUBB INSURANCE COMPANY LIMITED	1	\$6,135.00
	CHUBB INSURANCE COMPANY OF CANADA	1	\$6,754.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	1,799	\$32,946,513.00
	CHUBB NATIONAL INSURANCE COMPANY	1,582	\$66,309,955.00
	CHUBB SEGUROS BRASIL, S.A.	1	\$642.00
	EXECUTIVE RISK INDEMNITY INC.	6	\$1,661,561.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	3	\$213,165.00

	FEDERAL INSURANCE COMPANY	90,925	\$3,558,748,157.00
	GREAT NORTHERN INSURANCE COMPANY	22,807	\$710,266,687.00
	PACIFIC INDEMNITY COMPANY	3,356	\$369,995,206.00
	VIGILANT INSURANCE COMPANY	4,193	\$227,639,141.00
	ACE American Insurance Co	6,740	\$274,751,661.00
	ACE Fire Underwriters Ins	38	\$1,498,240.00
	ACE Property and Casualty	1,971	\$191,070,156.00
	Illinois Union Insurance	3,372	\$240,820,970.00
	Indemnity Insurance Co of	175	\$13,196,308.00
	Pacific Employers Insurance	14	\$51,084.00
	Westchester Surplus Lines	602	\$49,388,448.00
	WFIC for Bus.Eff.1/1/11	1,273	\$36,242,321.00
2019	CHUBB CUSTOM INSURANCE COMPANY	43	\$6,693,927.00
	CHUBB INDEMNITY INSURANCE COMPANY	486	\$50,083,542.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	97	\$2,469,028.00
	CHUBB NATIONAL INSURANCE COMPANY	124	\$6,526,910.00
	FEDERAL INSURANCE COMPANY	6,032	\$417,370,954.00
	GREAT NORTHERN INSURANCE COMPANY	1,745	\$97,044,347.00
	PACIFIC INDEMNITY COMPANY	233	\$39,736,490.00
	VIGILANT INSURANCE COMPANY	220	\$25,155,354.00
	ACE American Insurance Co	374	\$13,255,599.00
	ACE Fire Underwriters Ins	2	\$185,620.00
	ACE Property and Casualty	23	\$7,502,715.00
	Illinois Union Insurance	270	\$24,843,797.00
	Indemnity Insurance Co of	4	\$66,049.00
	Westchester Surplus Lines	3	\$538,022.00
	WFIC for Bus.Eff.1/1/11	18	\$174,830.00

• **For TAPS:**

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
2016	CHUBB INDEMNITY INSURANCE COMPANY	207	\$73,264,108.51
	CHUBB NATIONAL INSURANCE COMPANY	7	\$561,041.00
	FEDERAL INSURANCE COMPANY	536	\$143,625,269.12
	GREAT NORTHERN INSURANCE COMPANY	20	\$8,309,789.00
	PACIFIC INDEMNITY COMPANY	79	\$42,217,709.72
	VIGILANT INSURANCE COMPANY	47	\$17,102,989.00
2017	CHUBB INDEMNITY INSURANCE COMPANY	239	\$45,571,577.11
	CHUBB NATIONAL INSURANCE COMPANY	10	\$1,864,828.00
	FEDERAL INSURANCE COMPANY	496	\$144,179,731.68



	GREAT NORTHERN INSURANCE COMPANY	14	\$5,976,054.00
	PACIFIC INDEMNITY COMPANY	88	\$45,768,062.54
	VIGILANT INSURANCE COMPANY	34	\$8,858,947.00
2018	CHUBB INDEMNITY INSURANCE COMPANY	248	\$39,388,714.07
	CHUBB NATIONAL INSURANCE COMPANY	23	\$5,073,844.00
	FEDERAL INSURANCE COMPANY	484	\$123,103,492.27
	GREAT NORTHERN INSURANCE COMPANY	18	\$5,192,985.00
	PACIFIC INDEMNITY COMPANY	78	\$37,960,159.00
	VIGILANT INSURANCE COMPANY	19	\$5,771,749.00
2019	CHUBB INDEMNITY INSURANCE COMPANY	15	\$428,683.00
	CHUBB NATIONAL INSURANCE COMPANY	3	\$27,056.00
	FEDERAL INSURANCE COMPANY	54	\$5,438,248.00
	PACIFIC INDEMNITY COMPANY	13	\$1,779,809.00
	VIGILANT INSURANCE COMPANY	4	\$578,262.00

• **For IRMA:**

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
2016	ALBANY INSURANCE COMPANY	1	\$7,252.00
	CHUBB CUSTOM INSURANCE COMPANY	92	\$615,040.00
	CHUBB DE MEXICO	2	\$19,419.68
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	4	\$5,451.43
	CHUBB INSURANCE AUSTRALIA LIMITED	7	\$33,636.74
	CHUBB INSURANCE COMPANY LIMITED	6	\$3,758.22
	CHUBB INSURANCE COMPANY OF CANADA	1815	\$10,045,178.53
	CHUBB INSURANCE COMPANY OF NEW JERSEY	253	\$1,108,829.00
	FEDERAL INSURANCE COMPANY	11876	\$68,744,410.52
	GREAT NORTHERN INSURANCE COMPANY	3839	\$17,031,473.49
	PACIFIC INDEMNITY COMPANY	459	\$3,894,125.04
	SELF-INSURED RETENTION	1	\$750.00
	VIGILANT INSURANCE COMPANY	714	\$3,757,327.16
2017	CHUBB CUSTOM INSURANCE COMPANY	6	\$13,803.00
	CHUBB DE MEXICO	1	\$7,175.34
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	2	\$4,582.26
	CHUBB EUROPEAN GROUP SE	1	\$32,575.09
	CHUBB INSURANCE AUSTRALIA LIMITED	2	\$10,500.40
	CHUBB INSURANCE COMPANY LIMITED	4	\$15,067.52
	CHUBB INSURANCE COMPANY OF CANADA	1863	\$10,196,153.18



	CHUBB INSURANCE COMPANY OF NEW JERSEY	248	\$889,740.00
	FEDERAL INSURANCE COMPANY	11534	\$66,294,342.58
	GREAT NORTHERN INSURANCE COMPANY	3723	\$16,015,552.22
	PACIFIC INDEMNITY COMPANY	420	\$2,860,462.66
	VIGILANT INSURANCE COMPANY	684	\$3,348,817.42
2018	CHUBB CUSTOM INSURANCE COMPANY	2	\$4,782.00
	CHUBB INSURANCE COMPANY OF CANADA	1831	\$11,668,247.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	217	\$966,870.00
	FEDERAL INSURANCE COMPANY	10318	\$59,180,523.71
	GREAT NORTHERN INSURANCE COMPANY	3444	\$15,149,787.68
	PACIFIC INDEMNITY COMPANY	388	\$2,586,049.98
	VIGILANT INSURANCE COMPANY	644	\$3,085,724.04

- ERCIS Claims is a claims system (not a policy system), and therefore, there is no gross written premium or policy count associated with the application.
- For the Surety business unit for the years identified below (post-merger), the following application does not use Blaze Advisor® software: Cornerstone. However, as ordered by the Court, below are the approximate gross written premiums, policy counts, and identification of the insurance writing company that issued insurance policies that used Cornerstone:

Year/Writing Company	Policy Count	Gross Written Premium
<b>2016</b>	<b>324291</b>	<b>\$237,436,826</b>
Chubb Ins Co of Canada	13961	\$7,408,108
Federal Ins Co - Canada	10	\$0
Federal Insurance Co	285113	\$220,608,093
Great Northern Insurance Co	18	\$0
Pacific Indemnity Co	7427	\$5,000,954
Vigilant Insurance Co	17762	\$4,419,671
<b>2017</b>	<b>318828</b>	<b>\$259,641,111</b>
Chubb Ins Co of Canada	13966	\$11,328,070
Federal Insurance Co	280763	\$235,297,734
Great Northern Insurance Co	20	\$670
Pacific Indemnity Co	7309	\$9,784,435
Vigilant Insurance Co	16770	\$3,230,203
<b>2018</b>	<b>303229</b>	<b>\$137,058,165</b>
Chubb Ins Co of Canada	21276	\$14,657,186
Federal Insurance Co	261448	\$116,145,727
Great Northern Insurance Co	37	\$1,205

Pacific Indemnity Co	6540	\$4,497,351
Vigilant Insurance Co	13928	\$1,756,697

Dated: March 21, 2019

s/Terrence J. Fleming

Terrence J. Fleming (#0128983)

tfleming@fredlaw.com

Lora M. Friedemann (#0259615)

lfriedemann@fredlaw.com

Leah Janus (#0337365)

ljanus@fredlaw.com

Christopher D. Pham (#0390165)

cpham@fredlaw.com

**FREDRIKSON & BYRON, P.A.**

200 South Sixth Street, Suite 4000

Minneapolis, MN 55402-1425

(612) 492-7000 (tel.)

(612) 492-7077 (fax)

*Attorneys for Defendants*

**VERIFICATION**

Paul Seeley states under oath that he is a AVP, Information Technology; that he is authorized to respond to Plaintiff's Interrogatory Nos. 16 and 17 on behalf of Federal Insurance Company as it relates to the Chubb Specialty Insurance (CSI) business unit (pre-merger) and the Financial Lines Unit (post-merger); that he has relied on directors, employees, agents, and attorneys to provide information used in formulating the answers to the above interrogatories; and that the answers are true and correct to the best of his knowledge.

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Paul Seeley

Subscribed and sworn to before me  
this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

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Notary Public

**VERIFICATION**

C. Chase McCarthy states under oath that he is IT Lead, North America Commercial Middle Market/Chief Architect, Personal Risk Services; that he is authorized to respond to Plaintiff's Interrogatory Nos. 16 and 17 on behalf of Federal Insurance Company as it relates to the Chubb Commercial Insurance (CCI) business unit; that he has relied on directors, employees, agents, and attorneys to provide information used in formulating the answers to the above interrogatories; and that the answers are true and correct to the best of his knowledge.

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C. Chase McCarthy

Subscribed and sworn to before me  
this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

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Notary Public

**VERIFICATION**

Tracie D. Jerd states under oath that she is a AVP, NA Enterprise Solutions; that she is authorized to respond to Plaintiff's Interrogatory Nos. 16 and 17 on behalf of Federal Insurance Company as it relates to Premium Booking; that she has relied on directors, employees, agents, and attorneys to provide information used in formulating the answers to the above interrogatories; and that the answers are true and correct to the best of her knowledge.

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Tracie D. Jerd

Subscribed and sworn to before me  
this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

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Notary Public